\_L EFFECTIVENESS CHECK - SUMM🕰 ATTN: Recall Coordinator 3. MIS: 4. FROM: 5. HOURS EXPENDED TRAVEL 6. TYPE OF FOLLOW-UP: \_\_ON-SITE \_\_TELEPHONE 7. DATE INSPECTED Name 9. FIRM Name 8. FIRM INITIATING Address INSPECTED: Address THE RECALL: 11. HAZARD: 10. PRODUCT RECALLED: 12. TYPE OF CONSIGNEE: \_\_\_\_ Wholesaler \_\_\_\_ Retailer \_\_\_\_ Consumer \_\_\_\_ Other (Specify)\_\_\_ 13. PERSON(S) INTERVIEWED: Name & Title Name & Title \_\_\_\_\_ 14. WAS FIRM NOTIFIED OF RECALL? No \_\_\_\_\_ Yes METHOD & DATE OF NOTIFICATION \_\_\_ RECALL NOTIFICATION PRESENTED TO INVESTIGATOR \_\_\_\_\_No \_\_\_\_Yes (Notice date) \_\_\_\_\_ \_\_\_\_ No \_\_\_\_ Yes 15. DID FIRM FOLLOW RECALL INSTRUCTIONS? , \_\_\_\_N/A \_\_\_\_Yes Date\_\_\_\_ WAS PRODUCT TAKEN OFF SALE? \_\_\_\_No N/A No Yes (If "Yes" discuss details/ 16. WAS SUB-RECALL INVOLVED? mechanism under "REMARKS" 17. WERE RECALL/REPURCHASE OR CORRECTIVE ACTION PLAN NOTIFICATION SIGNS POSTED? \_\_\_\_\_N/A \_\_\_\_No \_\_\_\_Yes 18. INVENTORY OF RECALLED PRODUCT: a. Initial inventory received of the recalled product b. Inventory at time of notification c. Inventory at time of inspection\_\_\_\_\_ d. Number of returns 19. DISPOSITION OF RECALLED PRODUCT: NUMBER OF PRODUCTS DISPOSED: \_\_\_\_N/A \_\_\_\_None \_\_\_\_Yes (Report by separate memo) 20. INJURIES OR COMPLAINTS: 21. REMARKS:\_\_\_\_\_ INVESTIGATOR AND DATE 23. ENDORSEMENT:

SUPERVISOR AND DATE

LL EFFECTIVENESS CHECK - SUM \_ ATTN: Recall Coordinator 3. MIS: 5. HOURS EXPENDED\_\_\_\_\_TRAVEL\_\_\_ 6. TYPE OF FOLLOW-UP: \_\_ON-SITE \_\_TELEPHONE 7. DATE INSPECTED 8. FIRM 9. FIRM Name Name INITIATING Address\_\_\_\_\_ INSPECTED: Address THE RECALL: 11. HAZARD: 10. PRODUCT RECALLED: 12. TYPE OF CONSIGNEE: \_\_\_\_ Wholesaler \_\_\_\_ Retailer \_\_\_ Consumer \_\_\_\_ Other (Specify)\_\_\_\_\_ 13. PERSON(S) INTERVIEWED: Name & Title Name & Title 14. WAS FIRM NOTIFIED OF RECALL? Yes METHOD & DATE OF NOTIFICATION \_\_\_\_ RECALL NOTIFICATION PRESENTED TO INVESTIGATOR \_\_\_\_\_\_No \_\_\_\_\_Yes (Notice date) \_\_\_\_\_\_ , \_\_\_\_N/A \_\_\_No \_\_\_\_Yes \_\_\_No \_\_\_Yes Date\_\_\_\_ 15. DID FIRM FOLLOW RECALL INSTRUCTIONS? WAS PRODUCT TAKEN OFF SALE? \_\_\_\_N/A \_\_\_No \_\_\_Yes (If "Yes" discuss details/ 16. WAS SUB-RECALL INVOLVED? mechanism under "REMARKS") 17. WERE RECALL/REPURCHASE OR CORRECTIVE ACTION PLAN NOTIFICATION SIGNS POSTED? \_\_\_\_ N/A \_\_\_\_ No \_\_\_\_ Yes 18. INVENTORY OF RECALLED PRODUCT: a. Initial inventory received of the recalled product b. Inventory at time of notification\_ c. Inventory at time of inspection\_\_\_\_\_ d. Number of returns\_\_\_\_\_ 19. DISPOSITION OF RECALLED PRODUCT: NUMBER OF PRODUCTS DISPOSED: 20. INJURIES OR COMPLAINTS: \_\_\_\_ N/A \_\_\_\_ None \_\_\_\_ Yes (Report by separate memo) 21. REMARKS:\_\_\_\_ INVESTIGATOR AND DATE 23. ENDORSEMENT: SUPERVISOR AND DATE

38

# URGENT





# U.S. CONSUMER PRODUCT SAFETY COMMISSION WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE AND ENFORCEMENT

Division of **Corrective Actions** Tel: 301-504-0608 Ext. 1353 Fax: 301-504-0359

DATE:

May 3, 1995

PAGES TRANSMITTED: cover + 3

TO:

Eddie Cole

TITLE:

President

OFFICE:

Answer Products Inc. 805-257-4011

FROM:

James A. DeMarco, Compliance Officer, CECA, HQ

Attached is our technical evaluation of your defect assessment and "fix" REMARKS: adequacy; please comment. Note suggested periodic fork crown inspection and not annual. Also, give me an update on any new incidents or if you have a % of corrected units of the 1000 affected fork crowns??? Call if you like. I need info by 5/8/95. Thanks.

NOTE: If you have any problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOUR ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.



# U.S. CONSUMER PRODUCT SAFETY COMMISSION WASHINGTON, D.C. 20207

# OFFICE OF COMPLIANCE AND ENFORCEMENT

Division of Corrective Actions Tel: 301-504-0608 Ext. 1353 Fax: 301-504-0359

DATE:

May 3, 1995

PAGES TRANSMITTED: cover + 3

TO:

Eddie Cole

TITLE:

President

OFFICE:

Answer Products Inc. 80

805-257-4011

FROM:

James A. DeMarco, Compliance Officer, CECA, HQ

REMARKS: Attached is our technical evaluation of your defect assessment and "fix" adequacy; please comment. Note suggested periodic fork crown inspection and not annual. Also, give me an update on any new incidents or if you have a % of corrected units of the 1000 affected fork crowns??? Call if you like. I need info by 5/8/95. Thanks.

NOTE: If you have any problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOUR ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.





# United States CONSUMER PRODUCT SAFETY COMMISSION Washington, D.C. 20207

### **MEMORANDUM**

DATE: August 2, 1994

TO : James A. DeMarco, CECA

Through: Marc Schoem, Director, EXCE

James F. Hoebel, Acting Director, ESME

FROM: Thomas E. Caton, ESME Chone, Eat.

SUBJECT: PSA 9391, RP940124, Answer Products Inc. Manitou 2 and

M-Sport Suspension Forks for Mountain Bicycles

REF: (a) Telephone Conversation, Answer Products, Inc. and CECA, July 22, 1994

(b) Telephone Conversation, Answer Products, Inc. and CECA, July 28, 1994

# REQUEST

Review file, especially the technical assessments (parts 15a and 15b) and the proposed fix. Comment on the firm's ability to identify the problem and correct it adequately.

### BACKGROUND

Answer Products Inc. (Answer) is the assembler and distributor of the Manitou 2 and M-Sport suspension forks. These suspension forks provide the mountain bicycle rider with a shock absorber cushioning action. Answer is aware that some fork crowns used with these suspension forks may crack during use. If cracking occurs and is not detected, the fork and front wheel could separate and the rider could fall.

According to Answer, 1000 of the 23,587 fork crowns made between July 1, 1992 and December 20, 1992, may have been machined from aluminum alloy 6061-T6 extrusions of insufficient strength. The insufficient strength was believed to be due to an improper heat treatment by the extrusion supplier. Answer has two reasons for believing that approximately one thousand fork crowns are suspect. First, their extrusion supplier claims that

<sup>&</sup>lt;sup>1</sup>extrusion - a. The operation of producing rods, tubes, and various solid and hollow sections, by forcing heated metal through a suitable die by means of a ram. b. a form produced by the process. A Dictionary of Mining, Mineral, and Related Terms. Compiled and Edited by Paul W. Thrush and the Staff of the Bureau of Mines, 1968.

Page 2



five percent of the aluminum alloy 6061-T6 extrusions sent to Answer may be of insufficient strength. Second, Answer did not detect the problem during random sampling of incoming extrusions.

When Answer became aware of the cracking problem, they increased the fork crown's wall thickness to 0.150 inch from 0.100 inch. They initiated this change on December 20, 1992, to improve the margin of safety and to prevent cracking in the previously affected fork crown areas. Answer demonstrated the improvement provided by the thick wall with stress calculations. These calculations used the 200 lbf (890 N) load specified in 16 CFR §1512.18(k)(2), Fork and Frame Assembly Test as the load applied to the fork. The calculations show that increasing the wall thickness to 0.150 inch from 0.100 inch, decreases the stress in that section from 40,800 psi to 17,300 psi.

As of August 1, 1993, Answer reports that they have replaced 192 cracked Manitou 2 style fork crowns. All of these cracked fork crowns had walls that were 0.100 inch thick. There were no reports of cracking in the fork crowns with 0.150 inch thick walls.

In April 1994, Answer confirmed that the cracking problem resulted from the use of aluminum alloy 6061 extrusions with insufficient strength. They developed a hardness versus strength chart for aluminum alloy 6061-T6. From this chart, they decided that a minimum hardness of Rockwell B32 was needed for the aluminum alloy 6061-T6 extrusions used for making their fork crowns. Answer then had their extrusion supplier agree to verify the hardness of all extrusions that they shipped to Answer.

Answer believes that the cracking is easily detected. On June 29, 1994, Answer issued a notice requesting dealers to visually inspect the fork crowns of 1992-93 season Manitou 2 and M-Sport suspension forks. Those fork crowns found with cracks were to be replaced at no charge to the dealers or customers. Answer says that Manitou 1, Manitou 3, and Manitou Sport '94 suspension forks have not cracked and were not subject to this inspection program. Answer personnel explained during a telephone conversation [Reference (a)], that the product name acts as a date code. This is because they use a particular product name and graphics for only one season. For example, the 1992-93 season Manitou 2 suspension fork product name was changed to the Manitou 3 for the 1993-94 season and was previously the Manitou 1 for the 1991-92 season.

# DISCUSSION

ES received several exhibits of intact Manitou 2 and M-Sport suspension forks for examination. These exhibits had fork crown walls that were either 0.100 inch thick or 0.150 inch thick. No exhibits of a cracked fork crown were received. Answer provided calculations that show the improvement the wall thickening provides the crown fork.

Page 3



Answer's June 29, 1994, notice requesting dealers to do a visual inspection of 1992-93 season Manitou 2 and M-Sports suspension forks may locate those forks that have cracked. However, the notice does not address those fork crowns that may not have had sufficient use to have cracked. With additional use, these other suspect fork crowns may also crack. Answer developed a hardness/strength criterion for identifying those extrusions with sufficient strength. Hardness testing of the suspect crowns could separate those with insufficient strength from those with sufficient strength, but such a test program was not proposed. Therefore, a periodic inspection of all fork crowns with 0.100 inch thick walls may be needed to locate those fork crowns that may crack after the initial inspection.

### SUMMARY

ES did not have a cracked fork crown to examine. The cracking has been reported to occur only in fork crowns with 0.100 inches thick walls because no fork crowns with 0.150 inches thick walls have been reported to have cracked. As of August 1, 1993, Answer reports that they have replaced about 19 percent of the suspect fork crowns. All of these cracked fork crowns had walls that were 0.100 inch thick. There were no reports of cracking in the fork crowns with 0.150 inch thick walls.

Answer believes that the fork crown cracking of 1992-93 season suspension forks was the result of an improper heat treatment. This improper heat treatment produced extrusions of insufficient strength. Answer developed a hardness versus strength chart for aluminum alloy 6061-T6 extrusions. From this chart, Answer decided that the extrusions used for making fork crowns should have a minimum hardness. Answer convinced their material supplier to verify the hardness of all aluminum alloy 6061-T6 extrusions before shipping the extrusions to Answer. The hardness inspections by the supplier should assure that the aluminum alloy 6061-T6 extrusions Answer receives are of sufficient strength.

The 1992-93 season suspension forks can be identified from suspension forks made for other seasons by the product name because the product name is specific to a particular season.

ES believes that a periodic inspection program is needed instead of a single inspection. This is because a fork crown may not have had sufficient use to have cracked before its inspection. Unless all dealers obtain a hardness tester to separate those fork crowns made from extrusions with insufficient strength from those extrusions with sufficient strength, all subject fork crowns should be inspected periodically.

Except for the addition of periodic fork crown cracking inspections instead of a single inspection, Answer appears to have identified the source of the cracking and developed an adequate fix.

# IMPORTANT NOTICE

# DEALERS, PLEASE READ IMMEDIATELY

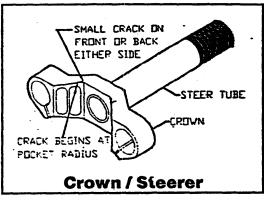
JUNE 29, 1994

Re: 1992-93 Answer Manitou 2 Mountain Bike Suspension Forks 1992-93 Answer M-Sport Mountain Bike Suspension Forks

Dear Manitou Retailer.

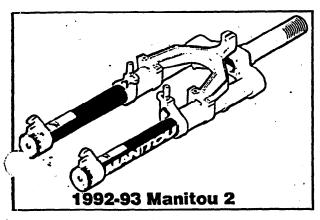
Answer Products has found that a small percentage of the 1992-93 season Manitou 2 and M-Sport fork crowns may develop cracks during use. Therefore, we are requesting that all of these forks be visually inspected by our Dealers for cracks and the crowns replaced if necessary. Manitou 1, Manitou 3, and Manitou Sport '94 forks are not subject to this inspection.

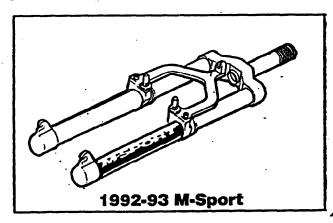
The cracks in the crown are the result of a small percentage of defective material that was used in the manufacture of the crowns. The cracks, if present, are plainly visible from the outer surface of the fork crown and require no disassembly to see. If cracks have developed and the fork continues to be used, the cracks may grow to a point where the crown may fail, completely separating the fork from the bicycle. This situation would result in loss of control of the bicycle with risk of physical injury to the rider.



# "e request that you please:

- 1. Notify all known purchases and owners to STOP USING THE MANITOU 2 AND '92 M-SPORT FORKS IMMEDIATELY UNTIL THE CROWN CAN BE INSPECTED by the individual or by Shop Personnel if necessary. If any cracks are apparent, then the crown must be removed and Answer will replace the crown at No Charge to the dealer or the consumer.
- 2. Post the enclosed notice in your store(s) in a conspicuous place.
- 3. Visually inspect all crowns in use for presence of cracks in the areas noted in Fig. 1.
- 4. Remove and replace crown / steerers if any cracks are visually evident.
- 5. Send the cracked crown / steerer to ANSWER PRODUCTS, 27460 AVENUE SCOTT, VALENCIA, CA 91355. (Do not send the entire fork, just the crown/steerer) Write "DEFECTIVE CROWN" on the package for quick identification and turn-around. It will be replaced at No Charge.





Answer Products, Inc • 27460 Avenue Scott • Valencia, CA 91355 • (805) 257-4411

# Consumer Notice Please Post

# IMPORTANT NOTICE

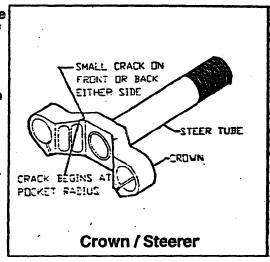
JUNE 29, 1994

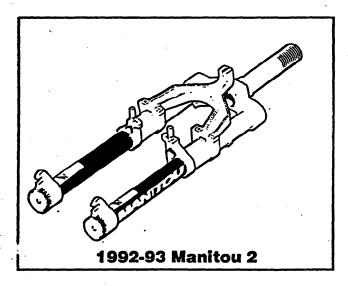
Re: 1992-93 Answer Manitou 2 Mountain Bike Suspension Forks 1992-93 Answer M-Sport Mountain Bike Suspension Forks

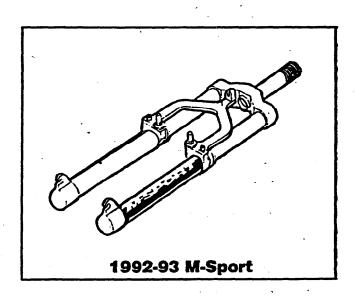
Answer Products has found that a small percentage of the 1992-93 season Manitou 2 and M-Sport fork crowns may develop cracks during use. Therefore, we are requesting that all of these forks to be visually inspected by a Manitou fork Dealer for cracks and the crowns replaced if necessary. Manitou 1, Manitou 3, and Manitou Sport '94 forks are not subject to this inspection.

The cracks in the crown are the result of a small percentage of defective material that was used in the manufacture of the crowns. The cracks, if present, are plainly visible from the outer surface of the fork crown and require no disassembly to see. If cracks have developed and the fork continues to be used, the cracks may grow to a point where the crown may fail, completely separating the fork from the bicycle. This situation would result in loss of control of the bicycle with risk of physical injury to the rider.

If you own a Manitou 2 or 1992-93 M-Sport fork, either visually inspect your own crown for cracks in the locations noted in Fig. 1, or have your authorized dealer visually inspect your crown prior to your next ride. If any cracks are apparent, then the crown must be removed and Answer will replace the crown at No Charge to the dealer or the customer. For further information, please contact your dealer or Answer's Warranty Dept. at (800) 423-0273, Ask for Ext. 201.







	ι (φ	
PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST	PSA ACTION (FOR PSA USE ONLY)	
lote: Print, use black pen, no blue ink.	9391	
Requested by: James DeMarco Org. Codes: CACA FOWR	Request number:	
requested by: Maines Denaite Org. Lodes: CACA FORK	Compliance no.: P/948/24	
Pate:7-5-94 Priority: b	<u></u>	
* Case# RP940124	Priority:	
	Received: $7/7/99$	
PRODUCT INFORMATION	(time/date)	
	7/24/94	
Manufacturer: Answer Products Inc. State: Valencia, CA 91355	Date Requested:	
Product: Suspension Fork for AT Bicycles	Due Date:	
	W.	
rand name, model, etcManitou 2		
ample number:n/a	Product:	
	Req'd. by: JD Org. CE-CA	
VALUATION REQUESTED:	ked d. by:	
ES- please do a file review especially focus on the parts '15a & 15b' or the technoial assessmen	ts,	
ests and proposed "fix" information and comment on the firm's ability to identify the problem and correct it	ASSIGNMENT:	
adequately	Date: 7/2/94 Org: E 4	
•	Assigned to:	
	Req. Summary: File 19 11	
	18-18- Fil	, 1
lazard: If the crown of a fork breaks or cracks it could separate from the wheel and result in loss of bicycle control by the rider.		
MILLOL BY THE LIMEL.		
	Completed:	
Requested date:7-24-94 Attachments:	<del>-</del>	
·		

46

Note:



Answer's June 29, 1994, notice requesting dealers to do a visual inspection of 1992-93 season Manitou 2 and M-Sports suspension forks may locate those forks that have cracked. However, the notice does not address those fork crowns that may not have had sufficient use to have cracked. With additional use, these other suspect fork crowns may also crack. Answer developed a hardness/strength criterion for identifying those extrusions with sufficient strength. Hardness testing of the suspect crowns could separate those with insufficient strength from those with sufficient strength, but such a test program was not proposed. Therefore, a periodic inspection of all fork crowns with 0.100 inch thick walls may be needed to locate those fork crowns that may crack after the initial inspection.

# SUMMARY

ES did not have a cracked fork crown to examine. The cracking has been reported to occur only in fork crowns with 0.100 inches thick walls because no fork crowns with 0.150 inches thick walls have been reported to have cracked. As of August 1, 1993, Answer reports that they have replaced about 19 percent of the suspect fork crowns. All of these cracked fork crowns had walls that were 0.100 inch thick. There were no reports of cracking in the fork crowns with 0.150 inch thick walls.

Answer believes that the fork crown cracking of 1992-93 season suspension forks was the result of an improper heat treatment. This improper heat treatment produced extrusions of insufficient strength. Answer developed a hardness versus strength chart for aluminum alloy 6061-T6 extrusions. From this chart, Answer decided that the extrusions used for making fork crowns should have a minimum hardness. Answer convinced their material supplier to verify the hardness of all aluminum alloy 6061-T6 extrusions before shipping the extrusions to Answer. The hardness inspections by the supplier should assure that the aluminum alloy 6061-T6 extrusions Answer receives are of sufficient strength.

The 1992-93 season suspension forks can be identified from suspension forks made for other seasons by the product name because the product name is specific to a particular season.

ES believes that a periodic inspection program is needed instead of a single inspection. This is because a fork crown may not have had sufficient use to have cracked before its inspection. Unless all dealers obtain a hardness tester to separate those fork crowns made from extrusions with insufficient strength from those extrusions with sufficient strength, all subject fork crowns should be inspected periodically.

Except for the addition of periodic fork crown cracking inspections instead of a single inspection, Answer appears to have identified the source of the cracking and developed an adequate fix.

### Certified Mail

Edward A. Cole, President Answer Products Inc. 27460 Ave. Scott Valencia, CA 91355

Re:

CPSC RP940124

Answer Products Inc.

Mountain Bike Suspension Fork

Dear Mr. Cole:

The staff of the Office of Compliance of the U.S. Consumer Product Safety Commission has reviewed the information available to us concerning the above-referenced product.

After careful consideration, the staff has made a preliminary determination that Answer Products suspension forks crowns present a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a), (copy enclosed). Specifically, the crowns may crack or break from the fork causing loss of control of the bicycle by the cyclist and resulting in a fall to the rider.

The staff welcomes and will give full consideration to any comments or additional information from you concerning our preliminary determination. The staff will meet with you as necessary to discuss your comments or corrective action.

The Division of Corrective Actions acknowledges and encourages the actions which Answer Products Inc. has already taken to correct this problem. Acting under delegation from the Commission, the Office of Compliance has accepted the plan as adequate.

The staff has reviewed the progress of the Answer Products Inc.'s corrective action plan. The Division of Corrective Actions has determined that no further monitoring on the part of the Commission is warranted. Therefore, acting under delegation from the Commission, the staff has closed this investigation. The Commission staff, however, will reopen this file if it finds that the public has not been adequately protected from the risk of injury presented by this product by the corrective actions

taken by the firm.

Your firm has a continuing obligation to inform the Commission of defects associated with this product which could create a substantial product hazard and of information which reasonably supports the conclusion that a product creates an unreasonable risk of serious injury or death. If you receive any information affecting the scope, prevalence, or seriousness of the defect or hazard, you must report to this Division.

We request that the company continue to implement its corrective action program until as many products as possible have been removed from the marketplace. If the firm receives or learns of any information which might indicate that its corrective actions are not satisfactory in eliminating the defect or hazard or that the effectiveness of the corrective action program was less than what had been anticipated, it must report that information to this division immediately.

Section 6(b)(1) requires the Commission to give notice thirty days in advance of the intended disclosure of information that identifies the manufacturer or private labeler of a product. The staff is enclosing a summary of the corrective action plan. The Commission publishes a list of product recalls and other corrective actions initiated by firms in an Annual Report to Congress. This information is also occasionally used in lists for specific product categories. This letter gives the firm its opportunity under section 6(b)(1) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2055(b)(1), and 16 C.F.R. Part 1101, to comment on the accuracy of the information.

The staff has made every effort to assure that the enclosed information is accurate. If, however, the firm believes that the information is not accurate, please send comments to James DeMarco. The firm's comments must be received within twenty—three calendar days of your receipt of this certified letter if they are to be considered. Please include with any comments specific information to support any claim that the information is not accurate. If the Commission decides to disclose the information, unchanged, over any accuracy objections, it will give the firm ten (10) working days notice, as required by section 6(b)(2) of the CPSA, 15 U.S.C. § 2055(b)(2).

Thank you for your cooperation in this matter. We hope that future dealings between the company and the Division of Corrective Actions, should they become necessary, will be conducted in the same spirit.

If you have any questions or desire assistance in responding to this letter, you may contact James A. DeMarco, U.S. Consumer Product Safety Commission, 4330 East West Highway, Room 613, Washington, D.C. 20207-0001, telephone: (301) 504-0608 extension 1353.

# Sincerely,

Marc J. Schoem Director Division of Corrective Actions

Enclosures
Compilation of CPSC Statutes
Substantial Hazard Regulations
FOIA Regulations
Information Disclosure Sheet
Corrective Action Summary

CC: Consumer Product Safety Commission Western Regional Center 600 Harrison Street Room 245 San Francisco, CA 94107-1370

Judith Hayes, CECA

Voluntary Corrective Action Plans Under Section 15 of the Consumer Product Safety Act and Section 15 of the Federal Hazardous Substances Act

The following is a list of voluntary corrective action plans recently accepted by the Commission (or the staff acting under authority delegated by the Commission). A firm's taking corrective action does not constitute admission by the firm that a substantial product hazard exists.

Space does not permit the staff to give a complete list of the specific model numbers of the products involved in each of these corrective actions. Consumers who believe that they have a product affected by one of these actions should follow the instructions given in this list or contact either the manufacturer or the Commission to determine if their product is one of those affected.

# DOCUMENT SUMMARY

Document Name: /usr/caal/jad/RP940124oclose
Document Title: pd/accept cap/close lette
Operator: jdj

: per tdr 1/91 rev Author

Comments:

Prototype

: <none>

# Statistics

	Date/	rime		worktime	keystrokes
Wed	Oct 23 199	91 08:33		01:24	79
Wed	May 10 199	95 15:23		38:25	565
Wed	May 10 19	95 15:24		•	
	<b>-</b> ,		To:		
			From:		
· ·					
Pages	Lines	Chars		Worktime	Keystrokes
	Wed Wed	Wed Oct 23 199 Wed May 10 199 Wed May 10 199		Wed Oct 23 1991 08:33 Wed May 10 1995 15:23 Wed May 10 1995 15:24  To: From:	Wed Oct 23 1991 08:33 01:24 Wed May 10 1995 15:23 38:25 Wed May 10 1995 15:24  To: From:  Pages Lines Chars Worktime

Total 158

# Concurrences

		·		 		<del></del>
SYMBOL			·		<u> </u>	
SURNAME						
DATE				•		

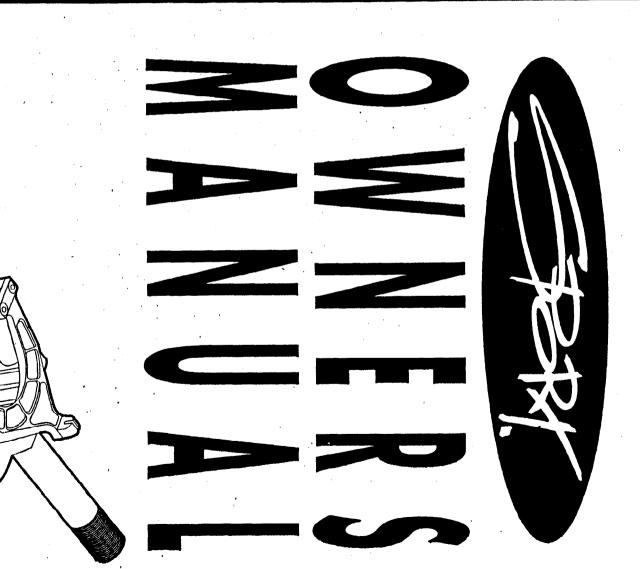
# Voluntary Corrective Action Plans Under Section 15 of the Consumer Product Safety Act and Section 15 of the Federal Hazardous Substances Act

Date	Firm and Product	Alleged Hazard	Remedy
05/95	Answer Products Inc. Valencia, CA 91355 Suspension Fork for Mountain Bikes	If the crown of a fork breaks or cracks it could separate from the wheel and result in loss of bicycle control by the rider.	The firm did an industry press release, letters to all dealers and distributors and warranty card holders. In addition, they posted point of purchase signs, had an 800 toll free line and replaced all crowns with new ones free of charge



# CONTRACTOR OF THE PROPERTY OF

ANSWER PRODUCTS INC. 27460 AVE SCOTT, VALENCIA, CA. 91355 PHONE: 805-257-4411 FAX: 805-257-4011



### TABLE OF CONTENTS

Installation Instr	ucti	on	s.			2
Spare Parts List		-	-			3
Exploded View						-4
Maintenance .						5
General Disasser	mbl	y.				5
Inspection			, •			6
Reassembly .				·		6
Brake Arch .						8
Inner Fork Leg						8
Adjusting the Ri	de (	Qua	aliti	es		9
Trouble Shooting	g.				•	10
Cycle Computer	Ins	tall	atio	n.		10

# MANITOU SPORT 94 PRECISION SUSPENSION FORK

CONGRATULATIONS FOR CHOOSING ONE OF THE BEST MOUNTAIN BIKE SUSPENSION FORKS MADE. THE MANITOU SPORT IS A HIGHLY SOPHISTICATED YET SIMPLE SYSTEM THAT MUST BE PROPERLY CARED FOR. IT IS MANDATORY TO READ THIS MANUAL ENTIRELY PRIOR TO WORKING ON THE MANITOU SPORT FORK.

The Manitou Sport Suspension Fork is CNC machined from high strength 6061 T6 Aluminum. The outer leg is specially precision drawn Easton E9 Aluminum with anodized graphics for protection as well as style. The anodized tubing is press fit into the brake flange and dropout to form a strong, maintenance free outer leg assembly. The inner legs are Easton precision taper drawn 7075 T6 Aluminum that are hard anodized and have been Teflon coated for a wear free and stiction free surface.

The suspension spring rate and damping are provided by the race-proven polyurethane elastopolymer damping stack. These specially matrixed polymers provide simple yet effectively tuned and maintenance free off road performance. Suspension travel is I 3/4" and has been tuned this year to be more active for the smaller bumps while at the same time more progressive for the larger ones. Different elastopolymers can be combined in the damping stack to adjust ride stiffness and rebound performance. The upper and lower UHMW bushings insure exact alignment between inner and outer legs and minimize front end flex. The CNC machined brake arch provides extra rigidity and front end stability in rough terrain while being as light as possible.

The Manitou Fork is fully assembled and ready to be installed onto your bicycle. Manitou suspension forks are available in three steer tube diameters 1" STD (25.4MM), 1.125 O.S. (28.6MM), and 1.250 EVO. (31.8MM) and four lengths, 5 1/2" (140MM), 6 1/2" (165MM), 7 1/2" (190MM), 8 1/2" (215MM), and 12" (305MM) threadless. Different density polyurethane compression elastomers have been included with your fork to permit tuning of the fork to your weight and riding style. Additional expanded option ride adjustment kits are available through your dealer carrying Manitou products.

IMPORTANT: The Manitou Fork is a competition off road fork, and as such does not come with proper reflectors for on road use. Have your dealer or mechanic install proper reflectors to meet the Consumer Product Safety Commission's (C.P.S.C.) standards if the fork is going to be used on the road at any time. If you have questions regarding C.P.S.C. Standards contact your dealer.

55

# INSTALLATION INSTRUCTIONS

(Figures 1, 2, &3)

Insure that the proper steer tube diameter and length has been delivered with your Manitou. The steer tube must be cut to length to fit your bicycle head tube. If you are not familiar with this procedure or do not have the proper tools to cut the steer tube it is recommended that you seek a qualified bicycle mechanic to perform installation.

NOTE: The steer tube is a one time precision press fit at the factory and cannot be removed from the crown. Replacement of the entire crown/steerer assembly must be done to change steer tube lengths or diameters.

- 1. Remove old forks from bicycle.
- 2. Measure and cut the steer tube to fit your bicycle head tube.
- 3. Remove crown race from old forks and press onto Manitou Sport steerer until seated on crown (Figure 1).
- 4. Clean and grease headset bearings and races of bicycle.
- 5 Install lower bearings on fork crown race.
- 6. Insert steer tube into head tube of frame.
- 7. Install upper bearings and race, tighten until slack just disappears.
- 8. Install washer and headset lock nut.
- Install stem and handlebars to desired height and torque stem bolt/clamping system to manufacturers instructions.

# NOTE: The Manitou Sport Fork is equipped with a secondary catch dropout.

- 10. Adjust front wheel quick release to clear the 1/4" secondary catch dropout. The quick release must be tightened after it is properly seated into the dropout counter bores. Insure that there is adequate thread engagement (4 or more threads with the release adjusted to lock) due to the wider adjustment. Install front wheel to bicycle per manufacturer's specification.
- 11. Obtain new brake inner and outer cable.
- 12. Trim outer cable length to fit into new brake cable retainer on brake arch. Do not use old retainer.

FIGURE 1: RACE INSTALLATION

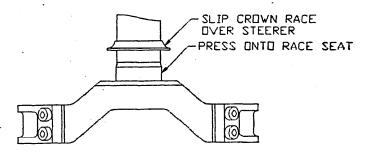
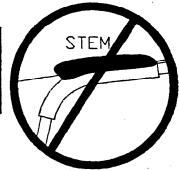


FIGURE 2: BRAKE CABLE ROUTING

IMPORTANT: Do not run your brake cable through the stem cable system of your bicycle. Bypass the stem routing completely and go directly to the brake arch of the Manitou Fork



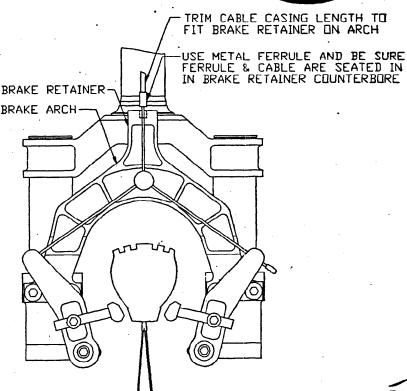
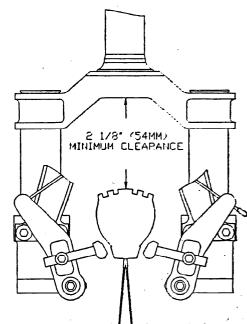


FIGURE 3: TIPE CLEAPANCE

IMPORTANT: When installing wheel or any new tire be sure to check that minimum tire clearance is at least 2 1/8 inches (54MM). Measure from the highest point on the tire to the bottom of the crown.

WARNING: Do not raise or lower the fork tubes in the crown. This could cause lack of proper tire clearance when the fork compresses or reduce the amount of skewer thread engagement in the leg. Either case constitutes an unsafe condition that may cause rider injury.



# SPARE PARTS (Tables 1&2)

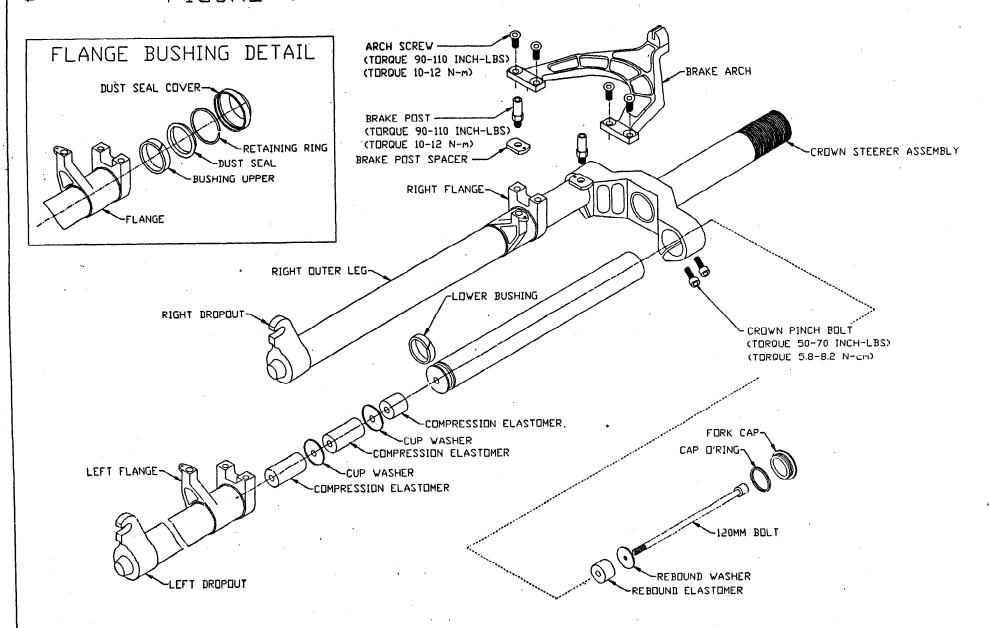
Spare parts can be ordered through your dealer. If you have any problems that you cannot resolve with your dealer, you may call Answer Products customer service at (805) 257-4411, 8:00 AM to 5:00 PM Monday through Friday.

•	
MANITOU SPORT SPARE	PARTS
PART NAME PAI	RT NUMBER
BRAKE ARCH	040441
BRAKE ARCH SCREW	040452
BRAKE POST	040442.
BRAKE POST SPACER	040592
CROWN PINCH BOLTS (5MM×20MM)	040646
INNER LEG	040713
M6-1.0 x 120 BOLT	040172
DUST SEAL COVER	040647
DUST SEAL RETAINING RING	040640
DUST SEAL	040166
BUSHING UPPER	040155
BUSHING LOVER	040154
REBOUND WASHER	040212
CUP WASHER	040717
INNER LEG CAP	040709
CAP D'RING	040439
DUTER LEG ASSEMBLY LEFT	040719
DUTER LEG ASSEMBLY RIGHT	040718
12" x 6MM HEX WRENCH	040171
FORK BOOT, CLEAR	85-3508
FORK BOOT, BLACK	85-3509
OWNERS MANUAL	040716
MANITOU SPORT ELAST	DMERS
REBOUND RUBBER 3/4 x 1/2	040163
COMPRESSION RUBBER 3/4' RED	040197
COMPRESSION RUBBER 1 1/2" BLUE	040177
EXTRA SOFT RIDE KIT (BLACK)	85-3500
SOFT RIDE KIT (BLUE)	85-3501
STOCK RIDE KIT (RED)	85-3507
HARD RIDE KIT (YELLOW)	85-3502

TABLE 2: CROWN/STEERER ASSEMBLY GUIDE					
	STEER TUBE DIAMETER				
STEER TUBE LENGTH	1.000 IN (25.4 MM) STANDARD	1.125 IN (28.6 MM) OVERSIZE	1.250 IN (31.8 MM) E∨OLUTION		
5.5 IN - (140 MM)	85-3400	85-3410	85-3420		
6.5 IN (165 MM)	85-3401	85-3411	85-3421		
7.5 IN (190 MM)	85-3402	85-3412	85-3422		
8.5 IN (216 MM)	85-3403	85-3413	85-3423		
12.0 IN (305 MM) THREADLESS	85-3404	85-3414	85-3424		
CROWN/STEERER ASSEMBLY (INCLUDES ALL PARTS SHOWN)  STEER TUBE  CROWN PINCH ELTS					

on the second of the second

# FIGURE 4: MANITOU SPORT 94 FORK SCHEMATIC





# **MAINTENANCE**

# NOTE: The Manitou should not be used if any parts are damaged. Contact your local dealer for replacement parts.

Your Manitou Fork is nearly maintenance free. however, moisture and contamination may build up inside the fork. Although this does not affect the performance of the Manitou, to insure long life it is recommended that the fork be periodically disassembled, cleaned, dried and re-greased. Disassembly and overhauling the Manitou every three months should be sufficient for normal conditions. Extreme use or frequent use in wet and muddy conditions may require monthly overhaul. When cleaning the fork, it is **NOT RECOMMENDED** to direct water spray at the seals.

# Before every ride you should:

- 1. Ensure that quick release skewers are properly adjusted and tight.
- 2. Wipe the inner legs clean & check entire fork for obvious damage.
- 3. Check headset slack.
- 4. Insure that the front brake cable is properly seated in the cable retainer & check brake adjustment

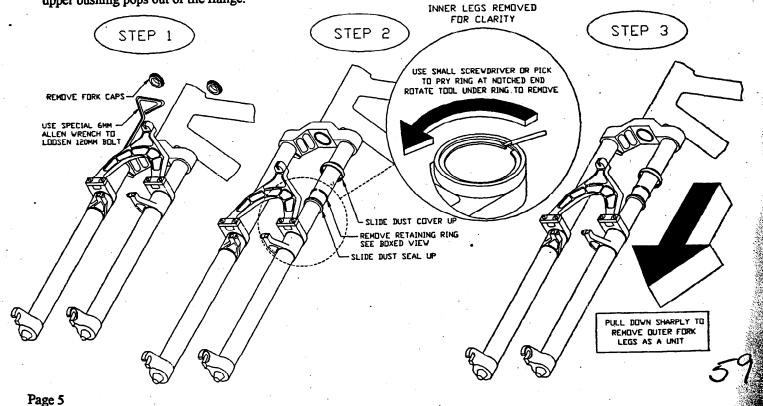
# **GENERAL DISASSEMBLY**

NOTE: The cantilever brakes, brake arch, and inner legs DO NOT need to be removed for general disassembly or cleaning. We recommend you AVOID DISASSEMBLING these components unless absolutely necessary. Fork crown and inner legs may be left installed on bicycle during disassembly. Disassembly of the Manitou Sport is required for elastomer replacement.

# Removal of outer legs (Figure 5)

- 1. Remove both fork caps.
- 2. Use the special 6MM allen wrench provided to loosen the two 6MMx120MM screws.
- 3. Pull legs down gently to get more room to work with the dust seal and retaining ring.
- 2. Lift dust seal cover off of flange boss and slide it up inner fork leg.
- 3. Use a small screwdriver or pointed tool to remove retaining ring (Figure 5).
- 4. Pry up dust seal until it is above flange taking care not to damage the seal lip.
- 5. Pull outer leg assembly down sharply to force upper bushing out of the flange. It may be necessary to pull several times before upper bushing pops out of the flange.

  FIGURE 5: FORK DISASSEMBLY



# **INSPECTION**

- 1. Check dust seal cover for tears or obvious damage. Replace if needed.
- 2. Check the dust seal for tears or damage. Replace if needed.
- 3. Inspect the lower and upper bushing for excessive wear or damage. Checking the drag between the lower bushing installed on the inner leg and the outer leg and then separately the upper bushing installed in the flange and the inner leg is a good indication of wear. Drag should be very slight, enough to hold the weight of the inner leg but not more. Replace if necessary.
- 4. Check all elastomers for splitting, cracks or other obvious damage. Replace if necessary.
- 5. Check the outer leg I.D. for deep gouges or dents. Replace if damaged.
- 6. Check the inner leg O.D. for deep gouges, check for other obvious damage. Minor wear resulting in removal of the black dye is not detrimental to the hard anodized surface. Replace if needed.

# **REASSEMBLY**

# 120MM Screw and Elastomer Stack (Figure 6)

- 1. Clean all parts thoroughly.
- 2. Slide retaining ring, dust seal, and upper bushing onto inner legs.
- 3. Put rebound washer and rebound elastomer onto 120MM screw and drop down into inner legs. Shake to get screw through inner leg plug.
- 4. Grease 120MM screw thoroughly and slide on desired compression elastomers. A cup washer must be between every
- 5. Grease and install lower bushing on inner leg plug.

# Outer leg Installation (Figure 7)

- 1. Grease I.D. of outer leg in and below upper bushing seat.
- 2. Install outer legs as a unit onto inner legs. Force lower bushings past flange area.
- 3. Using a screwdriver like tool push the upper bushing down into the flange. Take care not to damage bushing or scratch the inner leg.
- 4. Using similar tool, push the dust seal down into its cavity.
- 5. Install retaining ring by starting the wide end in the flange groove. While pushing down with a screwdriver rotate to feed ring into the groove, see figure 6 view). Install the ring so the end gap is oriented straight back. This will leave ring in the best position for removal later.
- 6. Slide dust seal covers down inner fork leg onto the flange boss. Be sure the lip on the dust seal cover snaps into the groove in the flange boss.
- 7. Push outer legs up until compression elastomers touch dropout while pushing the 120MM screw down with the special allen wrench. Start and tighten the 120MM screw to 30-40 INCH-LB (3.5-4.7 N-cm). Do not over tighten, just hand tight by hand with the special wrench is sufficient.

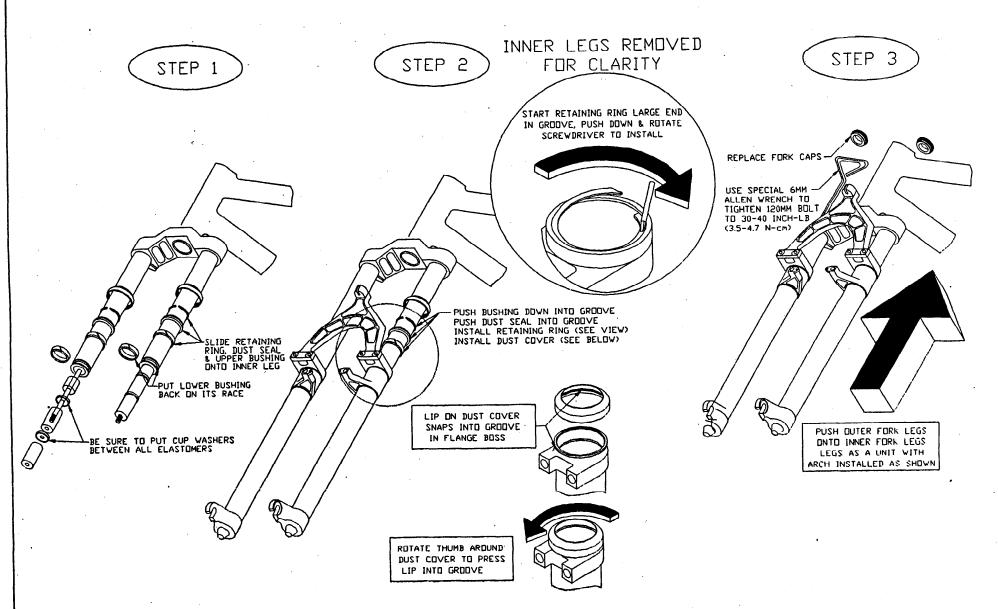
# **DUST BOOTS**

The Manitou Sport 94 comes equipped with a dust seal and a secondary dust seal cover that snaps onto the outside of the flange. For most riding conditions the seal stack is adequate, however for extra protection when riding in extremely wet or muddy conditions it is recommended that dust boots be used. Clear and black boots are available at your authorized Manitou dealer.

### To install:

- 1. Remove the inner legs from the crown.
- 2. Pull the dust seal covers off of the flange and remove from legs.
- 3. Slide on dust boots and snap onto groove in O.D. of flange.
- 4. Replace inner legs in crown, tighten & torque to 50-70 inch-lb. (5.8-8.2 N-cm).
- 5. Extend boots until they touch bottom of crown and fix with zip tie.
- 6. Re-attach front brake cable and adjust as necessary.

FIGURE 6: FORK REASSEMBLY



titi voi

# **BRAKE ARCH**

NOTE: Manitou Sport 94, Manitou 2 and Manitou 3 brake arches are interchangeable but are not interchangeable with Manitou 1 & M-Sport 93.

### Removal:

- 1. Disconnect the cantilever brake cable from the brake retainer on the arch.
- 2. Remove the four 6MM allen screws.
- 3. Remove arch.

# Reassembly:

- 1. Clean all mating surfaces and threads.
- 2. Install arch onto flanges
- 3. Install four 6MM allen screws.
- 4. Torque 6MM allen screws to 90-110 inch-lb. (10-12 N-m).
- 5. Replace cantilever brake cable in brake retainer.

# INNER FORK LEGS (Figure 7)

During normal maintenance the inner fork legs do not need to be removed from the crown. It is recommended that the torque joints be left undisturbed.

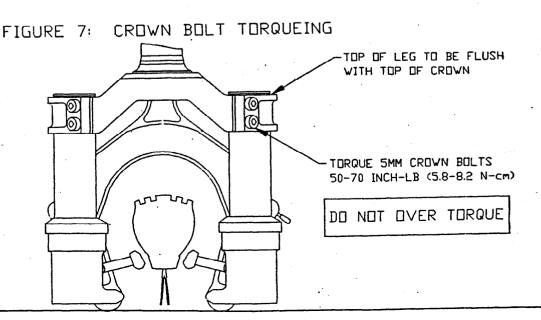
# Disassembly:

- 1. Loosen the four 5MM allen screws located in the crown.
- 2. Remove fork caps.
- 3. With twisting movement remove the inner fork legs.

### Reassembly:

- 1. Clean mating surfaces of crown and inner fork legs.
- 2. Install inner fork legs into crown so top of leg is flush with crown surface.
- 3. Tighten and torque four 5MM allen bolts to 50-70 inch-lb. (5.8-8.2 N-cm).
- 4. Replace fork caps.
- 5. Inspect to verify 2 1/8" (54MM) minimum clearance between tire and crown.

# WARNING: Do not over tighten crown pinch bolts. Tighten only to 50-70 inch-lb. (5.8-8.2 N-cm).



02

# ADJUSTING RIDE QUALITIES (Figures 8 & Table 2)

Maniton forks offer a wide adjustment range to suit individual riding preference and weight by simply changing the urethane elastomers. The Maniton Sport fork has been tuned to achieve 1 3/4" (44.5MM) of travel and has a more active ride that better absorbs small bumps while being progressive enough for the large ones. Each production fork comes with two 1 1/2" blue and one 3/4" red compression elastomers and is appropriate for a moderate rider of 145-170 lb. The fork also includes a pair of softer elastomers (blue) and firmer elastomers (yellow) to allow moderate customization of the ride.

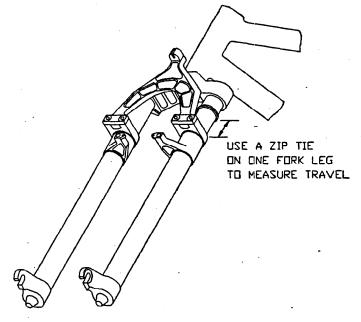
FIGURE 8:

# Coarse Tuning:

Normal riding should result in 1 1/2" (38.5MM) to 1 5/8" (41MM) of travel. Large hits should use full travel of 1 3/4" (44.5MM). An excessively soft compression stack will use full travel frequently and put excessive stress on the elastomers. A mushy feel with frequent noticeable bottoming will occur. An excessively firm compression stack will not use full travel. If your forks are too soft or too firm and need coarse tuning, disassemble per owners manual instructions and replace the elastomers and ride test. In addition to the replacement elastomers provided with the fork, an expanded soft ride and firm ride kit are available through your dealer as an accessory. The soft ride kit is a complete set of blue compression elastomers and the firm ride kit is a complete set of yellow compression elastomers. Each set contains four 1 1/2" and two 3/4" elastomers and four cup washers. Any combination of colors can be used to obtain the ride that suits your preference, although it is not recommended to use a soft elastomer like black in a stack of hard elastomers like vellow. The soft elastomer will be overpowered by the firm ones.

Manitou forks seem to become firm in cold weather. Elastomer spring rate testing indicates that the elastomers, unlike oil hydraulic systems, are nearly unaffected by temperatures ranging from 32F-120F (OC-50C). Thickening of the grease in the fork however can cause extra stiction causing the fork to feel more firm. Changing to a light oil like Silkolene or Tetra Bike lube will eliminate the stiction.

TABLE 2: ELASTOMER RIDE KITS



ZIP-TIE TRAVEL INDICATOR

COLOR	STIFFNESS	RIDE KIT	PART NO.
BLACK	EXTRA SOFT	EXTRA SOFT	85-3500
BLUE	SOFT	SOFT RIDE	85-3501
BLUE	SOFT	0.7.0014	1 1/2" 040177
RED	MEDIUM	STOCK	3/4" 040197
RED	MEDIUM	STOCK RIDE	85-3507
YELLOW	FIRM	FIRM RIDE	85-3502

### TROUBLE SHOOTING

Fork seems to "top out" or has a slight clunking feel when front wheel comes off the ground:

Excessive preload will result in a "top out". Selecting elastomers with that better fit your weight and riding style will eliminate "top out".

The fork feels less active and is not getting the travel it used to when it was new:

Chances are that the fork is developing stiction. Complete disassembly, cleaning, and re-greasing is recommended periodically especially after mud rides. This will keep the fork in good shape and working like new. Greasing the 120MM bolt helps eliminate sticktion as the elastomers slide up and down.

Outer legs feel loose on inner legs and bushings, a knock or rock can be felt when pushed from side to side: Either the lower bushing is missing or wore out. Disassemble per instructions, check both the upper and lower bushings for excessive damage and replace if necessary. Clean, grease, and reassemble.

It is difficult to get 120MM bolt threaded into the dropout in the reassembly process.

Trying to get this bolt started in a blind hole at the bottom of a long tube is tricky at best. Follow the reassembly instructions carefully. Some helpful hints are:

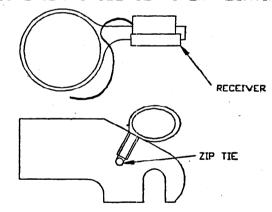
- 1. Try keeping the fork as close to vertical and not tipped when attempting to get the bolt started. If the bolt still does not start, try tipping slightly in one direction and then the other.
- 2. Do not tighten one side and attempt to do the other. You need all the slack in the system you can get to help maneuver the other bolt to get it started.
- 3. Do not push up too hard with the lower legs. The end of the bolt needs to be able to "seek" the threaded hole in the dropout. Alternating light to medium pressure may help. When the bolt does find the countersink leading to the threads a slight click can be heard or felt.

**CYCLE COMPUTER INSTALLATION INSTRUCTIONS Figure 9** Follow the instructions in your owners manual with the following exceptions:

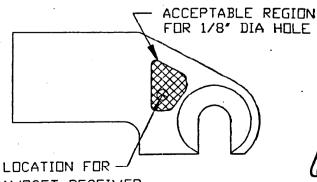
- 1. Remove the front wheel and locate the receiver on the top of the right dropout.
- 2. Use the template to locate any holes drilled in the dropout in the acceptable region.
- 3. Use a center punch or nail to punch mark the location of the hole in the right dropout.
- 4. Drill 1/8" dia. hole through the dropout.
- 5. Attach the receiver to the dropout by passing a zip tie through the hole and the receiver and tighten it securely (see sketch).
- 6. Attach the wire to the wheel side of the fork leg using zip ties or a strip of electrician's tape. Wind the wire around the brake arch and then the front brake cable casing on its path up to the handlebar mount. Do not attach the wire to the bicycle frame or any other part that does not turn with the handlebar and fork. Doing so will reduce the life span of the wire.

Note: The drill template shows the acceptable region to drill a 1/8" (3MM) dia. hole through the dropout. Drilling in other areas could damage the dropout. The template also shows the recommended location for the Avocet receiver. Use the newer Avocet adjustable receiver identified by its lateral ratchet slider. Old Avocet receivers are fixed position and will not perform correctly on the Manitou Fork.

CYCLE COMPUTER MOUNTING FIGURE 12:



DRILL TEMPLATE



AVOCET RECEIVER

Page 10



ANSWER PRODUCTS, INC. 27460 AVENUE SCOTT, VALENCIA, CA 91355

June 29, 1994

Mr. James A. DeMarco
Compliance Officer
Division of Corrective Actions
U.S. Consumer Product Safety Commission
4330 East West Highway
Room 613
Washington, D.C. 20207-0001

RECEIVED

JUL 5 A.M.

Re: CPSC RP940124

Answer Products, Inc.

Suspension Fork for AT Bicycles

Compliance and Enforcement CPSC

NOTICE: This document contains confidential trade secret, commercial, financial, or otherwise privileged and confidential information exempt from public disclosure pursuant to 5 U.S.C. § 552(b)(4)

Dear Mr. DeMarco:

We submit this letter as requested in Marc J. Schoem's letter to me dated May 3, 1994. We consider the information and materials provided to be confidential and exempt from disclosure under Section 6(a) of the CPSA, 15 U.S.C. § 2055(a), and the Freedom of Information Act, 5 U.S.C. § 552(b)(4). This letter and its supporting materials contain confidential trade secret, financial, commercial, or otherwise privileged information provided to the CPSC at its specific request to promote its regulatory responsibilities. This letter and supporting materials involve commercially valuable engineering drawings,

tests, and other information used in creating Answer Products' products. The letter and supporting materials also contain certain commercial information, exempt from disclosure, such as commercial designs. Disclosure of the information contained in this letter and supporting materials may cause substantial harm to Answer Products' competitive position.

We trust that we will be notified and provided an opportunity to seek protection of the information and materials discussed in and provided with this letter if the CPSC considers their disclosure.

Please consider this letter together with the information and materials provided with this letter to constitute a "full report," pursuant to 16 C.F.R. § 1115.13(d).

Answer Products makes this full report at the specific request of the Consumer Product Safety Commission, as required under 16 C.F.R. § 1115.13(d). Answer Products does not believe that the Manitou 2 or M-Sport (the Manitou 2 style) suspension forks discussed in this letter and supporting materials contain a substantial defect creating a substantial product hazard within the meaning of Section 15(b) of the Consumer Product Safety Act or an unreasonable risk of serious injury or death. We emphasize that Answer Products genuinely believes in its products' quality